IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

JESSICA JONES, MICHELLE VELOTTA, and CHRISTINA LORENZEN on Behalf of Themselves and All Others Similarly Situated,

Case No. 2:20-cv-02892-SHL-cgc

Plaintiffs.

v.

VARSITY BRANDS, LLC; VARSITY SPIRIT, LLC; VARSITY SPIRIT FASHION & SUPPLIES, LLC; U.S. ALL STAR FEDERATION, INC.; JEFF WEBB; CHARLESBANK CAPITAL PARTNERS LLC; and BAIN CAPITAL PRIVATE EQUITY,

Defendants.

DECLARATION OF STEVEN N. WILLIAMS

- I, Steven N. Williams, declare and state as follows:
- 1. I am a partner at the Joseph Saveri Law Firm, LLP. ("JSLF"), counsel for Plaintiffs Jessica Jones, Michelle Velotta, and Christina Lorenzen (collectively, "Plaintiffs"), in *Jones v. Bain Capital Private Equity*, case no. 2:20-cv-02892-SHL-cgc (the "*Jones*" action). I am a member in good standing of the State Bar of California and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them. I make this declaration pursuant to 28 U.S.C. § 1746.

DECLARATION IN SUPPORT OF THE MOTION TO WITHDRAW AS COUNSEL

- 2. Christina Lorenzen, represented by this law firm, is a plaintiff in this case. A written contract sets for the terms of the agreement between Ms. Lorenzen and JSLF.
- 3. On September 29, 2021, I emailed Ms. Lorenzen to attempt to set up a phone conversation about her case.

4. Later that day, Christina Lorenzen responded saying she would not speak with

me.

5. Subsequently, I and my assistant reached out to Ms. Lorenzen checking

availability for a phone call at 2:30 to 3:30 PM PT that same day, or on September 30, 2021, at

12:30 to 1:00 PM PT.

6. On September 30, 2021, upon no response from Christina Lorenzen, the firm

reached out offering additional time slots of October 1, 2021, at 4:30 PM PT and October 11,

2021, at 2:00 PM PT.

7. On October 13, 2021, I sent notice to Christina Lorenza that this motion would be

filed. There has been no response from Christina Lorenza.

8. There has been no further communications at this time, and no response from

Christina Lorenzen.

I declare under penalty of perjury that the foregoing is true and correct, and this

Declaration is executed at San Francisco, California on October 14, 2021.

By: /s/ Steven. N. Williams
Steven N. Williams

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2021, I served a copy of the foregoing document via email on the counsel listed below.

George S. Cary
Steven J. Kaiser
CLEARY COTTLIER ST

CLEARY GOTTLIEB STEEN & HAMILTON LLP

2112 Pennsylvania Avenue, NW Washington, DC 20037 gcary@cgsh.com skaiser@cgsh.com

Paul Coggins
Brendan Gaffney
LOCKE LORD LLP
2200 Ross Avenue, Suite 2800
Dallas, TX 75201
pcoggins@lockelord.com
bgaffney@lockelord.com

Matthew S. Mulqueen Adam S. Baldridge

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ

165 Madison Avenue, Suite 2000

Memphis, TN 38103 Phone: (901) 526-2000 Fax: (901) 577-0866

mmulqueen@bakerdonelson.com abaldridge@bakerdonelson.com

Grady Garrison
Nicole D. Berkowitz
James Andrew Roach
BAKER, DONELSON, BEARMAN,

CALDWELL & BERKOWITZ
165 Madison Avenue, Suite 2000

Memphis, TN 38103

ggarrison@bakerdonelson.com nberkowitz@bakerdonelson.com aroach@bakerdonelson.com

I hereby certify that on October 16, 2021, I served a copy of the foregoing document via Overnight Delivery on the party listed below.

Plaintiff Christina Lorenzen 1604 Willow Dr. Berthoud, CO 805013

/s/ Ashleigh Jensen

Ashleigh Jensen